

## **SECTION EIGHT**

# Training the Collection Day Staff

**P**roper training of all personnel is essential to a safe and efficient collection. Training required for the contractor's staff, volunteers, and the sponsor's in-house staff is described below.

## The Contractor's Staff

The contractor is responsible for ensuring that all of its technical and professional staff are properly trained and certified. The contract should specify the qualifications of the professional personnel who will be present at the collection.

If your state requires an operating permit for HHW collection, staff training might need to meet the requirements of the Occupational Safety and Health Act, Section 1910.120. Check with your state agency to determine training requirements. These regulations specify the content and length of training required for personnel at hazardous waste operations. The level of training required for each employee depends on his or her job functions and responsibilities. Topics that must be covered include the names of personnel responsible for site safety and health, the hazards present at the site, the use of personal protective equipment, work practices that can minimize risks, the safe use of engineering controls and equipment on the site, and medical surveillance requirements. In any case, this training is recommended for all personnel who will be handling the waste, even if it is not required.

The contractor's staff can include technicians, chemists, and a manager. The manager should receive training appropriate for his or her involvement in the physical operation of the program. Chemists should have 40 hours of field chemist/technician training to the Occupational Safety and Health Administration's (OSHA'S) "Site Emergency Responder" level. Technicians should have eight hours of training to the "First Responder Operations" level, since they would have to evacuate everyone from

the site in the event of an emergency. The contractor's staff also must be briefed on any limitations of the permit or the facility, including excluded materials and procedures to be followed.

Reviews and drills of the emergency plan should be conducted for all collection day personnel by qualified instructors. For regularly scheduled collections, the training program should provide for update sessions to reinforce safety procedures and provide updated packing information.



## Volunteers and In-House Staff

The volunteers and in-house staff who will work at the collection site must also receive proper training. Because of accident and liability concerns, the responsibilities of the volunteers at a one-day collection are usually limited to controlling traffic, con-

ducting participant surveys, and providing general assistance, such as running errands, emptying trash, and providing refreshments.

The sponsor's in-house staff can perform other collection day tasks, such as unloading cars, pouring used oil into consolidation drums, or opening and scraping out paint cans, depending on the volunteers' training and qualifications. All these tasks must



## TRAINING THE STAFF

be performed under the contractor's supervision.

In some cases, the state or municipality will provide professional staff to carry out some of the more technical work. The state hazardous waste contact (Appendix B) can provide information about appropriate training for these personnel (such as OSHA's 40-hour, 20-hour, and 8-hour courses).

The sponsor's project coordinator and the contractor should explain to volunteers and in-house staff what they may and may not do on collection day; the procedures for re-

ceiving participants, controlling traffic, and handling waste; and what their roles would be in the event of an accident or spill.

Before the collection date, the sponsor should hold an orientation session with the contractor for all volunteers and in-house staff who will be working at the collection site. This session should inform the volunteers about the operating procedures and emergency plan. Police and other emergency personnel who will be on site or on call should participate in the planning and orientation.